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June 19, 2006

VIA ELECTRONIC MAIL AND U.S. MAIL

Alessandro A. Iuppa, Superintendent
Attn: Vanessa J. Leon
Docket No. INS-06-900
Maine Bureau of Insurance
34 State House Station
Gardiner, Maine 04333-0034

In Re: Review Of Aggregate Measurable Cost Savings Determined By Dirigo Health
For The Second Assessment Year

FILING COVERSHEET

Dear Superintendent Iuppa:

Enclosed for filing please find the following:

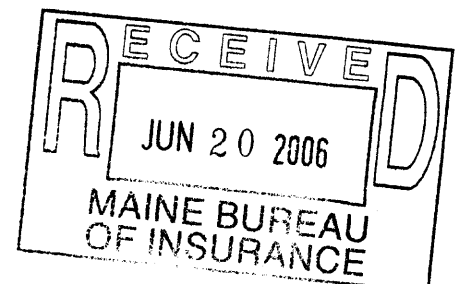
SUBMITTED BY: Christopher T. Roach
DATE: June 19, 2006
DOCUMENT TITLE: Anthem BCBS Brief
DOCUMENT TYPE: Anthem BCBS's Reservation With Respect to Informational
Requests And Presentation of Additional Evidence And Request
for Enlargement Of Time To File Reply Brief
CONFIDENTIAL: NO

Thank you for your assistance in this matter.

Very truly yours,

Christopher T. Roach

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OF INSURANCE



NON-CONFIDENTIAL

STATE OF MAINE
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION
BUREAU OF INSURANCE

IN RE:)	
)	ANTHEM BCBS'S RESERVATION
REVIEW OF AGGREGATE)	WITH RESPECT TO
MEASURABLE COST SAVINGS)	INFORMATIONAL REQUESTS AND
DETERMINED BY DIRIGO HEALTH)	PRESENTATION OF ADDITIONAL
FOR THE SECOND ASSESSMENT)	EVIDENCE AND REQUEST
YEAR)	ENLARGEMENT OF TIME TO FILE
)	REPLY BRIEF
Docket No. INS-06-900)	
)	
)	June 19, 2006

NON-CONFIDENTIAL

Pursuant to the Notice of Pending Proceeding and Hearing issued by the Superintendent on April 26, 2006 ("Notice of Proceeding"), Anthem Health Plans of Maine, Inc. d/b/a/ Anthem Blue Cross and Blue Shield ("Anthem BCBS"), by and through its attorney, hereby (1) reserves its right to serve limited informational requests and present additional evidence at hearing in response to additional evidence proposed by any other party, and (2) requests an enlargement of the deadline for intervenors to file their reply briefs up to and including July 7, 2006.

Anthem BCBS's position is that the methodology for year 2 calculation of aggregate measurable cost savings was fully developed before the Board. Anthem BCBS does not agree that all of the Board's decisions on methodology were reasonable, but does believe that the record was developed on this point. Accordingly, at this time, Anthem BCBS has no additional evidence to present or informational requests to propound. However, to the extent other parties to this proceeding are granted leave to serve informational requests or present additional evidence, Anthem BCBS requests that it be allowed to 1) propound informational requests upon the other parties to this proceeding based on the additional evidence and/or responses to the informational requests, and 2) offer its own evidence, including but not limited to rebuttal evidence, relating to the additional evidence and/or responses to the informational requests.

Anthem BCBS also requests that the deadline for intervenors to file their reply briefs be extended from Wednesday, July 5, 2006 to Friday, July 7, 2006. Pursuant to the Procedural Order, the intervenors' briefs are due Friday, June 23, the Dirigo briefs Friday, June 30, and the intervenors' reply briefs on Wednesday, July 5. Given that the intervenors' time to respond to the Dirigo briefs is only five days, two of which are weekend days and another a national holiday, Anthem BCBS requests enlargement of the deadline for intervenors' reply briefs from July 5 to July 7, 2006. Counsel for the DHA Board, William Laubenstein, has indicated that he has no objection to this request.

DATED: June 19, 2006

A handwritten signature in black ink, appearing to read 'C. Roach', written over a horizontal line.

Christopher T. Roach, Esq.

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Attorney for Anthem BCBS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 19, 2006, a copy of Anthem BCBS's Reservation with respect to Informational Requests And Presentation of Additional Evidence And Enlargement Of Time To File Reply Brief was served on each of the persons listed below and in the manner indicated.

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DATED: June 19, 2006



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